

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS (BOSTON)

In re:

LEV GOLDFARB and
LYDMILA ROGALIN,
Debtor

Chapter 13
Case No. 16-12339

EUGENE PELIKOV,
Plaintiff
Vs.

Adversary Proceeding
No: 16-01131

GOLD AND FARB, INC.,
LEV GOLDFARB,
ALEXANDER GOLDFARB AND
LYDMILA ROGALIN
Defendants.

MOTION TO EXTEND DISCOVERY DEADLINE

NOW COME, Lev Goldfarb, Ludmila Rogalin, Alex Goldfarb and Gold and Farb, Inc., through their respective counsel and respectfully request this court to modify the discovery deadline of May 29, 2017 by extending it by approximately 60 days to July 29, 2017 and to continue the deadline for filing of the Joint Pre-Trial Memorandum to August 29, 2017.

In support of such request the movants state that the extension is warranted as the litigant has reached a settlement in principal. Therefore, the extension is necessitated by the parties continuing settlement efforts.

WHEREFORE, the movant respectfully request this court to grant the relief as prayed and to grant such other and further relief as is just and proper.

[signature lines appear on the following page]

LEV GOLDFARB and
LYDMILA ROGALIN,
By their counsel:



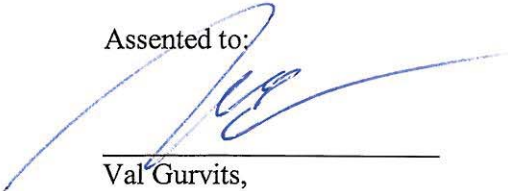
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ALEX GOLDFARB and
GOLD AND FARB, INC.
By its counsel,

/s/ James P. Ehrhard

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Dated: March 7, 2017

Assented to:



Val Gurvits,
Attorney for Eugene Pelikov

CERTIFICATE OF SERVICE

I, Vladimir von Timroth, counsel for the Defendants, hereby certify that on this 9th day of May, 2017, I served a copy of the foregoing MOTION by first class mail, postage prepaid to the parties listed below:



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